

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

DORMAN ANGEL <i>et al.</i> , Plaintiffs,)	
)	
)	
v.)	CIVIL ACTION NO. C-1-01-467
)	JUDGE BECKWITH
UNITED PAPERWORKERS)	
INTERNATIONAL UNION (PACE))	
LOCAL 1967, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

DEFENDANT SMART PAPERS' IDENTIFICATION OF WITNESSES

Pursuant to the Court's Order of April 20, 2004, defendant Smart Papers, LLC ("Smart Papers") hereby identifies the following persons as possible lay witnesses and further provides a summary of their anticipated testimony:

1. **Milton Lewis**, 601 North B Street, Hamilton, Ohio 45013. Mr. Lewis will testify about his employment at Smart Papers, the company in general, its policies and procedures, the start-up of Smart Papers' operations after February 9, 2001, and other matters relating to the claims and defenses in this action.

2. **Dan Maheu**, 601 North B Street, Hamilton, Ohio 45013. Mr. Maheu will testify about his employment at Smart Papers, the company in general, its policies and procedures, Smart Papers' acquisition of the Hamilton B Street Mill, Smart Papers' lack of involvement in negotiations over the January 31, 2001 Effects Bargaining Agreement, Smart Papers' initial staffing decisions for the Hamilton B Street Mill during February

2001, the start-up of Smart Papers' operations after February 9, 2001, and any other information he may have relating to the claims and defenses in this action.

3. **Mary Rita Weissman**, The Weissman Group, 353 Regency Ridge Drive, Dayton, Ohio 45459. Ms. Weissman will testify about Smart Papers' initial staffing decisions for the Hamilton B Street Mill during February 2001 and any other information she may have relating to the claims and defenses in this action

4. Any witnesses identified by other parties in this action.

5. Since discovery is ongoing, defendant reserves the right to supplement this list with the names of any lay witnesses identified during the course of discovery.

Respectfully submitted,

s/Robert J. Hollingsworth
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LLC

DATED: December 1, 2004

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2004, I electronically filed Defendant Smart Papers' Identification of Witnesses with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Counsel for Plaintiffs:

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